

David B. Markowitz, OSB #742046
DavidMarkowitz@MarkowitzHerbold.com
Laura Salerno Owens, OSB #076230
LauraSalerno@MarkowitzHerbold.com
Harry B. Wilson, OSB #077214
HarryWilson@MarkowitzHerbold.com
Lauren F. Blaesing, OSB #113305
LaurenBlaesing@MarkowitzHerbold.com
Vivek A. Kothari, OSB #182089
VivekKothari@MarkowitzHerbold.com
MARKOWITZ HERBOLD PC
1455 SW Broadway, Suite 1900
Portland, OR 97201
Telephone: (503) 295-3085
Special Assistant Attorneys General for Defendants
Additional Counsel of Record Listed on Signature Page

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

WYATT B. and NOAH F. by their next friend
Michelle McAllister; KYLIE R. and ALEC R.
by their next friend Kathleen Megill Strek;
UNIQUE L. by her next friend Annette Smith;
SIMON S. by his next friend Paul Aubry;
RUTH T. by her next friend Michelle Bartov;
BERNARD C. by his next friend Ksen Murry;
NAOMI B. by her next friend Kathleen
Megill Strek; and NORMAN N. by his next
friend Tracy Gregg, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

TINA KOTEK, Governor of Oregon in her
official capacity; FARIBORZ
PAKSERESHT, Director, Oregon Department
of Human Services in his official capacity;
APRILLE FLINT-GERNER, Director, Child
Welfare in her official capacity; and OREGON
DEPARTMENT OF HUMAN SERVICES,

Defendants.

Case No. 6:19-cv-00556-AA

**DEFENDANTS' COUNTER-
DESIGNATIONS**

INTRODUCTION

Pursuant to the Court's April 19, 2024 Minute Order (ECF 382) adopting the Stipulated Amended Case Schedule (ECF 377), defendants hereby provide the following counter-designations, to be considered in conjunction with defendants' objections to plaintiffs' deposition designations (ECF 427), filed concurrently. Defendants hereby incorporate their general and specific objections to plaintiffs' deposition designations, as detailed in ECF 427. Defendants further offer counter-designations as described below, in light of any evidentiary rulings by the Court on these or other objections, or for purposes of rebuttal.

COUNTER-DESIGNATIONS

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Nancy Allen (August 29, 2023)	27:24-28:3, 29:1:4, 37:6-9, 45:9-13, 49:19-23, 52:14-53:2, 90:9-91:24
Lacey Andresen (June 15, 2023)	15:14-25, 21:21-22:25, 37:22-24, 43:2-9, 92:5-93:23, 94:25, 103:6-9, 103:16-104:4, 107:12-23, 108:23-25, 117:24-120:17, 142:16-143:25, 144:8-21, 153:19-154:5,
Uma Ahluwalia (March 19, 2024)	11:3-12:3, 21:11-3, 25:7-22, 31:23-32:14, 52:24-53:4, 57:20-21, 59:10-21. 60:14-18, 60:23
Stacey Ayers (December 1, 2021)	42:1, 53:16-17, 64:8-9, 78:22-25, 87:1-3, 94:2-10, 94:21-25, 95:1-24, 114:22-24, 217:13-25, 218:1-5
Stacey Ayers (May 16, 2022)	19:4-23:2, 25:14-23, 26:2-16, 50:3-15, 60:5-13, 62:11-63:11
Jim Dimas (March 13, 2024)	88:22-89:13, 114:1-11, 118:5-119:17, 127:21-128:2, 152:1-155:1, 157:11-158:25, 184:19-185:1, 53:25, 103:24-104:3, 124:13-16,
Aprille Flint-Gerner (September 12, 2023)	50:9-21, 54:20-23, 56:4-8, 60:3-61:1, 64:6-17, 75:14-20, 76:4-8

Witness	Designation
Sara Fox (September 14, 2023)	21:24-22:17, 23:17-24:2, 25:16-25, 26:5-10, 29:13-17, 31:18-32:8, 35:24, 36:8-10, 36:19-20, 41:3-42:1, 42:12-14, 43:1-3, 42:23-25, 44:7-8, 45:1, 51:7-10, 51:20-52:8, 58:17-20, 64:6-7, 64:11-12, 64:17-21, 70:3-4, 70:24-71:2, 71:11-23, 77:23-14, 81:15-16, 82:1-5, 83:8-12, 98:1, 100:23-101:2, 107:20-112:3, 112:5-25, 113:16-114:12, 116:10-11, 116:13-16, 118:1-5, 117:18-25, 127:3-8, 127:13, 150:12-24, 152:16-19, 152:21-25, 153:22-25, 190:22-191:21, 194:1-4, 207:13-208:2, 209:7-210:6, 214:8-25, 216:15-217:1, 230:5-231:1, 239:5-6
Kevin George (December 10, 2020)	68:4, 68:22-23, 190:21-191:16, 191:18-24
Rebecca Jones Gaston (March 15, 2022)	
Rebecca Jones Gaston (June 28, 2022)	
Kim Keller (September 13, 2023)	21:25-23:03, 51:05-51:25, 119:10-120:5, 123:02-124:10, 26:14-27:04, 120:12-23, 81:9-83:17
Deena Loughary (September 11, 2023)	20:07-14, 25:14, 25:25, 26:09-12, 26:17-23, 26:25-28:11, 28:15-1, 29:18-30:09, 30:14-18, 30:20-24, 31:19-21, 33:10-40:19, 34:06-35:08, 35:17-23, 37:20-25, 39:19-40:19, 42:05-15, 46:02-46:22, 47:13-25, 50:19-52:12, 54:23-55:02, 64:08-64:18, 65:02-05, 67:06-67:25, 68:3, 73:02-74:01, 78:01-79:01, 80:06-80:18, 108:19-25, 109:15-23, 115:07-12, 120:18-121:22, 134:20, 153:12-154:04, 182:01-04, 21:02-11
Glenda Marshall (September 7, 2023)	18:1-22, 24:23-25:22, 45:22-23, 66:15-67:8, 91:15-92:1, 99:12-17, 178:23-179:14
Bowen McBeath (April 19, 2024)	Transcript not yet available
Stacey Moss (March 18, 2024)	34:21-35:13, 35:20-25, 37:13-38:3, 39:4-9, 40:1-40:11, 42:15-20, 160:18-161:22, 162:1-5, 163:16-164:10, 164:15-20
Cynthia Richter-Jackson (March 29, 2024)	Transcript not yet available

Witness	Designation
Peter Rosenblatt (December 17, 2020)	50:12-20, 51:4-9, 52:14-21, 111:23-114:8, 134:21-136:25, 138:18-139:8, 140:13-15, 140:18-141:5, 172:3-173:13
Sarah Vinson (April 25, 2024)	Transcript not yet available
Desta Walsh (February 26, 2021)	23:21-24, 33:1-20, 40:4-43:4, 99:5-25, 113:22-116:5

DATED: April 26, 2024.

ELLEN ROSENBLUM
ATTORNEY GENERAL
FOR THE STATE OF OREGON

s/Laura Salerno Owens

David B. Markowitz, OSB #742046
DavidMarkowitz@MarkowitzHerbold.com
Laura Salerno Owens, OSB #076230
LauraSalerno@MarkowitzHerbold.com
Harry B. Wilson, OSB #077214
HarryWilson@MarkowitzHerbold.com
Lauren F. Blaesing, OSB #113305
LaurenBlaesing@MarkowitzHerbold.com
Vivek A. Kothari, OSB #182089
VivekKothari@MarkowitzHerbold.com
Special Assistant Attorneys General for Defendants

Adele J. Ridenour, OSB #061556
AdeleRidenour@MarkowitzHerbold.com
Of Attorneys for Defendants

Carla A. Scott, OSB #054725
carla.a.scott@doj.state.or.us
Sheila H. Potter, OSB #993485
sheila.potter@doj.state.or.us
Of Attorneys for Defendants

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